



COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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November 20, 2001

SENT VIA EMAIL AND U.S. MAIL

Bruce P. Beausejour, Esq.
Victor D. Del Vecchio, Esq.
Verizon Massachusetts
185 Franklin Street, Room 1403
Boston, MA 02110

Re: D.T.E. 01-31
D.T.E.'s Fourth Set of Information Requests

Dear Messrs. Beausejour and Del Vecchio:

Enclosed please find the fourth set of questions to Verizon Massachusetts issued by the Department in the above-captioned matter. Please submit Verizon's responses to the Department and the participants in hard copy and by email on or before 5:00 p.m., Thursday, November 30, 2001. Should you have any questions, please contact me at (617) 305-3608.

Sincerely,

/s/

Paula Foley
Hearing Officer

Encs.

cc: D.T.E. 01-31 service list (w/encs.)

INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Verizon Massachusetts the following Information Requests.

Instructions

The following instructions apply to the Information Requests issued to all parties in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punched page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:

Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, and on all Department staff and parties; and submit two (2) copies of the responses to Paula Foley, Hearing Officer.

QUESTIONS TO VERIZON MASSACHUSETTS

D.T.E. 01-31
November 20, 2001

1. Please answer the following questions using the table provided. Add written comments to explain your answers if needed. If the answer is unknown, please indicate with "UNK" in the applicable space and provide a written response as to why Verizon is unable to provide the information requested.
 - a. Please list the technologies that would be considered substitutes for the services in the top row.
 - b. Please provide the number of companies in Massachusetts that are currently offering the services found in the top row (i.e., "actual competitors").
 - c. Please provide the number of companies in Massachusetts that are currently operating in Massachusetts (but are not currently providing the services in the top row) that could offer the services in top row within one year (i.e., "potential competitors").

	residential local exchange service	small business local exchange service	small business data/ internet service	high speed voice and data systems (med-lg business)	high speed services for telecom, internet and data providers	collocation services
a. substitute technologies						
b. number of current actual competitors						
c. number of current potential competitors						

2. Are advanced data services included in Verizon's Alternative Regulation Plan? If so, please give examples of those services and state under which part of the Plan they are included.
3. Please provide the number of Massachusetts exchanges that have:
 - a. Less than five percent of lines provided by CLECs;
 - b. Between five and ten percent of lines provided by CLECs;
 - c. Between ten and twenty percent of lines provided by CLECs; and
 - d. Over twenty percent of lines provided by CLECs.

Please dis-aggregate business and residential lines in your answer.

4. Please provide a separate color-coded exchange map for business and residential CLEC line density, which indicates the geographic distribution of the above data in the following format:
- | | |
|---------|-----------------------|
| Red: | Over twenty percent |
| Blue: | Ten to twenty percent |
| Yellow: | Five to ten percent |
| White: | zero to five percent |
5. Please describe all the services (*i.e.*, voice; data; 1 voice/data line, 24 voice/data lines; advanced calling features; switched; non-switched; etc.) which could be provided on the following digital communications services found in Section C of Verizon's M.D.T.E. Tariff No. 10:
- DIGIPATH® Digital Service (DDS)
 - SUPERPATH® 1.544 Mbps Digital Service
 - SWITCHWAY® switched 56 Kbps Service
 - INFOPATH® Packet Switching Service
 - Digital PBX Services
 - SUPERPATH® Fractional T-1 Digital Service
 - DOVPATH® Service
 - DIGIPATH® Digital Service II (DDSII)
 - Integrated Services Digital Network (ISDN) Services
 - Network Reconfiguration Service (NRS)
 - Digital Automatic Call Distribution (ACD) from DMS 10
6. Is a collocation hotel the only competitive segment of the collocation industry? Explain.
7. To interconnect with Verizon's network or UNEs, please explain the alternatives to CLEC collocation at Verizon central offices.

Questions Based upon William Taylor's Rejoinder Testimony

8. See p. 2, lines 2-4: Please explain why measures for market share are limited in their usefulness for firms that "inherited high market share?" In the context of being applied along with the elasticity of supply of fringe firms and the market demand elasticity in order to estimate the incumbent's price elasticity of demand, why is this not a useful measure?
9. See p. 2, line 7: According to Dr. Taylor's testimony, "Bright line tests can be devised and have been implemented by the FCC." Please describe the bright line tests referred to in this statement and when and how they have been implemented by the FCC.

Questions Based upon William Taylor's Rebuttal Testimony

10. See p. 3, line 25: According to Dr. Taylor's testimony, Dr. Taylor suggests that Dr. Mayo's recommendation for a market power inquiry requires "18,000 separate market power studies." Dr Mayo has responded that this impression arises from improperly defined relevant markets. How does Dr. Taylor define the relevant markets?
11. See p. 19, line 7 through p. 20, line 7: Please define the term "efficient price" as used in this portion of Dr. Taylor's testimony.

Questions Based upon Robert Mudge's Rebuttal Testimony

12. See p. 10, lines 3-5: Please explain which "other" carriers are successfully expanding fixed wireless operations in Massachusetts.
13. See p. 4, line 17: According to Mr. Mudge's testimony, "[C]ustomers in every city and town throughout the state do have alternative for their local phone service, and as the most recent numbers show, those customers are choosing such alternatives." Please define the term "local phone service" as used here.
14. Are CLEC switch providers counted as collocators in any of Mr. Mudge's testimony, testimony exhibits, or responses to information requests? If so, please explain where and why.

Questions Based upon the Massachusetts Competitive Profile

15. Please explain why resold lines and UNE-P lines are not in the E911 database. Explain what information is contained within the E911 database.
16. Please explain why some carriers are listed as collocators or resellers in certain exchanges but are not listed as offering services in those exchanges.
17. See Verizon's response to ATT-3-1: Does Verizon use the terms "UNE-P providers" and "facilities-based UNE-P providers" interchangeably in the Massachusetts Competitive Profile?

Questions Based upon Michael J. Doane's Rebuttal Testimony

18. See p. 11, line 15 through p. 12, line 3: Please define the term "facilities-based" as used in this portion of Mr. Doane's testimony.
19. See Exh. MJD-3: Are CLEC switch providers counted as collocators in this exhibit to Mr. Doane's testimony?